

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|--------------------------|---|------------------|
| MONSANTO COMPANY and |) | |
| |) | |
| MONSANTO TECHNOLOGY LLC, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | CIVIL ACTION NO. |
| |) | |
| ZEFERINO SAUCEDA, |) | |
| |) | |
| Defendant. |) | |

PROTECTIVE ORDER

Plaintiffs Monsanto Company and Monsanto Technology LLC (“Monsanto”) seek a protective order to prevent the Defendant from destroying cotton fields or crop residue before Monsanto can inspect and sample the fields. Pursuant to Federal Rule of Civil Procedure 26(c), Monsanto proposes that the following provisions shall govern the protective order:

1. This Order prevents the Defendant and any other person or entity acting in concert with the Defendant from destroying any evidence at issue in this lawsuit, including cotton crops or crop residue (either by tilling or by conducting any farm operation that would disturb the crops or crop residue), and/or cotton seeds, wherever they exist and/or are stored, before Monsanto can inspect and sample the fields and storage locations.

2. This Order shall remain in full force and effect until (1) Monsanto’s inspection is completed and reports to the Court that the Order of Protection is no longer necessary; (2) such time it is modified, amended or rescinded by the Court; or (3) until such time as the parties may petition the Court to modify or amend its terms.

SO ORDERED:

Dated: _____
_____ Judge